Aberdeen Proving Ground
Hazardous Materials Management Procedures Manual

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Table of Contents

1. Definitions
   a. De Minimis
   b. Hazardous Chemical
   c. Hazardous Materials
   d. The HAZMART
   e. Persistent Bioaccumulative and Toxic Chemicals
2. Procedures
   a. Maintaining Hazardous Materials Inventory Data
   b. Hazardous Materials Procurement
   c. Receiving Hazardous Materials
      (1) Activity Orders and Directly Receives Hazardous Materials
      (2) Activity Procures Hazardous Materials; Items Delivered to the HAZMART
      (3) DOL Procures, Stocks, and Receives Hazardous Materials
   d. Hazardous Materials Tracking
      (1) Container Tracking
      (2) Container Transfers
      (3) In-Container Tracking
      (4) Underground Storage Tank/Aboveground Storage Tank
      (5) Cylinders
      (6) Excess Hazardous Materials Reissue
   e. Contractor Requirements
3. Activity Distribution Sites
4. Ensuring Compliance
5. Training
   a. P2 Awareness and Hazardous Materials Management
   b. Pollution Prevention—The Anthology
   c. Pollution Prevention Refresher 1999—Green Painting
   d. Pollution Prevention Refresher 2000—Case Study
6. Buying Green

Enclosure 1 - Hazardous Materials, Federal Stock Classes
Enclosure 2 - HAZMART Data Input Form (STEAP-SH Form 101-R)
Enclosure 3 - Hazardous Materials Tracking Log (STEAP-SH Form 102-R)
Enclosure 4 - Recovered Materials Advisory Notice Summary

1. Definitions

a. De Minimis. Small or trifling.

b. Hazardous Chemical. The phrase “hazardous chemical” is defined in sections 335 and 370 of 40 Code of Federal Regulations (CFR), which implemented the Emergency Planning and Community Right-to-Know Act (EPCRA). The definition in 40 CFR is the same as the definition in 29 CFR, 1910.1200(c), except that, under 40 CFR, the term does not include the following substances:

(1) Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration.

(2) Any substance present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use.

(3) Any substance to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and used by the general public.

(4) Any substance to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual.

(5) Any substance to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

The term “hazardous chemical” is used in this document when referring to purely reporting issues.

c. Hazardous Material. A hazardous material as defined in the federal standard (FED-STD) “Federal Standard, Material Safety Data, Transportation Data and Disposal Data for Hazardous Materials Furnished to Government Activities” (FED-STD-313C, 3 April 96). The standard, authorized by the General Services Administration (GSA) for use by all federal agencies, includes the following substances:

(1) Any item or chemical that is a "health hazard" or "physical hazard" as defined by the Occupational Safety and Health Administration (OSHA) in 29 CFR 1910.1200.

(a) Chemicals that are carcinogens, toxic, or highly toxic agents, reproductive toxins; irritants; corrosives; sensitizers; nephrotoxins; neurotoxins;

agents that act on the hematopoietic system; and agents that damage the lungs, skin, eyes, or mucus membranes.

(b) Chemicals that are combustible liquids, compressed gases, explosives, flammable liquids, flammable solids, organic peroxides, oxidizers, pyrophorics, unstable (reactive), or water-reactive.

(c) Chemicals that, in the course of normal handling, use, or storage operations, may produce or release dusts, gases, fumes, vapors, mists or smoke that have any of the above characteristics.

(2) Any item or chemical that is reportable or potentially reportable or notifiable as inventory under the requirements of the Hazardous Chemical Reporting (40 CFR Part 370) or as an environmental release under the reporting requirements of the Toxic Chemical Release Reporting: Community Right To Know (40 CFR Part 372), which includes chemicals with special characteristics that, in the opinion of the manufacturer, can cause harm to people, plants, or animals when released by spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discard of barrels, containers, and other receptacles).

(3) Any item or chemical that, when being transported or moved, is a risk to public safety or an environmental hazard and is regulated as such by one or more of the following regulators:

(a) Department of Transportation Hazardous Materials Regulations (49 CFR 100-180).

(b) International Maritime Dangerous Goods Code of the International Maritime Organization.

(c) Dangerous Goods Regulations of the International Air Transport Association.

(d) Technical Instructions of the International Civil Aviation Organization.

(e) U.S. Air Force Joint Manual, Preparing Hazardous Materials for Military Air Shipments (AFJMAN 24-204).

The term “hazardous material” is used in this document when referring to non-reporting activities.

d. The HAZMART. The Aberdeen Proving Ground (APG) HAZMART, or hazardous materials pharmacy, serves as the installation's primary point of entry for hazardous materials.

Note: In order to reduce costs, electronic reporting capabilities must be used to maintain inventories whenever possible.

Note: Do not remove barcode labels.

The installation HAZMART provides a complete hazardous materials inventory, simplifies EPCRA Tier II and Toxic Release Inventory (TRI) reporting, facilitates the sharing of excess materials among activities, and generates reports to guide other pollution prevention activities. Material safety data sheets (MSDSs) can be obtained from the HAZMART. The HAZMART is in building E5137, telephone 410-436-7480/7481/7482, fax 410-436-4719, or e-mail hazmart@dshe.apg.army.mil.

Note: Make all requests for HAZMART services, particularly for reports, in writing (including e-mail).

Each activity distribution site (ADS) is responsible for the maintenance of its hazardous materials inventory and ancillary data (e.g., MSDSs, Hazardous Materials Tracking Logs, and HAZMART Data Input Forms) and for all activity data that are incorporated into regulatory reports.

e. Persistent, Bioaccumulative, and Toxic (PBT) Chemicals. Chemicals that are toxic, persist in the environment, and bioaccumulate in food chains and, thus, pose risks to human health and ecosystems.

Note: All PBT chemicals are reportable regardless of their concentration in a mixture.

2. Procedures

a. Maintaining Hazardous Materials Inventory Data. The barcoding determination for a hazardous material, as a general rule, is based upon the manufacturer's environmental precautionary statement. Any product with a manufacturer's precautionary statement of "Warning" or "Danger," regardless of size, shall be tracked/barcoded by container. Any product that has a manufacturer's precautionary statement of "Caution" and that is less than one gallon requires only a pallet/case barcode. Any product that is labeled "Caution" and is more than one gallon/5 pounds requires an individual container barcode.

Any aerosol, irrespective of the manufacturer's precautionary statement, shall be tracked/barcoded by container.

The regulatory language specifically exempts de minimis concentrations of a toxic chemical in a mixture. A pure form of a chemical will not qualify for the de minimis exemption because it is not a mixture. While the legal definition of "de minimis" does not denote a specific percentage, the Environmental Protection Agency (EPA) has set two levels below which the exemption will applies. If a noncarcinogenic toxic chemical is present in a mixture at a concentration below 1 percent or if an OSHA carcinogen is below 0.1 percent, the amount of the toxic chemical in that mixture should not be factored into threshold determination or release reporting and should not be subject to supplier notification. De minimis amounts of listed toxic chemicals in mixtures are exempt from EPCRA Section 313 consideration.

Contact the installation HAZMART if there is a conflict between the product MSDS and label.

b. Hazardous Materials Procurement. Activities that purchase hazardous materials through government or commercial suppliers are responsible for ensuring that environmental, safety and health, inventory, and emergency-planning data are entered into the tracking system. All activities, in conjunction with the installation HAZMART and ADSs, are required to reduce the purchase, use, and off-site disposal of hazardous materials. The individual who is responsible for a new product being brought onto the installation must secure an MSDS for the installation.

The person ordering hazardous materials is responsible for requesting that the buyer, ordering activity, and/or procurement agency notify the vendors that shipments of hazardous materials are to be accompanied by the applicable MSDSs. Each buyer, ordering activity, and/or procurement agency is responsible for ensuring that the user's request for the MSDS is relayed to the vendor. In accordance with 49 CFR, all shipments of hazardous materials are to be accompanied by an MSDS if it contains a new item, if the formulation of a product has changed, or if the product label does not match the MSDS. Each activity is responsible for immediately notifying the HAZMART if any item requiring an MSDS is received without one.

c. Receiving Hazardous Materials. The following options are available to each activity to ensure that all hazardous materials delivered to Aberdeen Proving Ground are entered into the tracking system.

(1) Activity Orders and Directly Receives Hazardous Materials. A barcode label shall be applied to each container/kit/case/pallet of hazardous material. The barcode number and container label data shall be entered on the HAZMART Data Input Form (encl. 2) or input directly into the Hazardous Inventory Tracking System (HITS) database. The form (if electronic capabilities are unavailable) and the applicable MSDS shall be provided to the HAZMART weekly or upon completion, whichever comes first, for validation and entry into the tracking system. An activity must obtain barcode labels from the HAZMART prior to receiving direct deliveries. The HAZMART,

on request, will help an activity process occasional large orders, subject to Directorate of Safety, Health and Environment (DSHE) approval and manpower availability.

(2) Activity Procures Hazardous Materials; Items Delivered to the HAZMART. An activity may elect to have hazardous materials delivered directly to the HAZMART. The HAZMART will barcode each item as appropriate and enter inventory information and MSDSs into HITS. Within 24 hours of receipt, the Directorate of Logistics (DOL) will notify the user that the item(s) are available for pick up or will arrange to deliver the materials to the user during normal duty hours. Before delivery, the activity shall forward purchase documents to the DOL Hazardous Materials Warehouse (building E5707, telephone 410-436-3270, fax 410-436-3966) to ensure proper identification of the activity and user and to facilitate record keeping. When a tank is filled the receiver will provide the associated delivery form to the HAZMART.

(3) DOL Procures, Stocks, and Receives Hazardous Materials. For items procured or stocked by DOL, the HAZMART will apply barcodes and enter MSDS and inventory information into HITS. Within 24 hours of receipt, DOL will notify the user that the item(s) are available for pickup or will arrange to deliver the materials to the user during normal duty hours.

d. Hazardous Materials Tracking. Supplemental HAZMART assistance is available, when funded by the requesting activity, and may include, for example, reorganizations, major moves, and re-inventories.

(1) Container Tracking. Hazardous materials within an activity shall be tracked by completing a Hazardous Materials Tracking Log, listing barcode numbers and final locations, or inputting data directly into HITS using a barcode reader (Intermek Trakker) programmed by the HAZMART to read the colored hazardous materials barcode labels.

As stated in paragraph 2.a., hazardous materials shall be tracked by container, with exceptions. The barcoding determination for hazardous materials, in most cases, is based upon the manufacturer's precautionary label (i.e., Caution, Warning, and Danger). If hazardous materials are tracked by the case or pallet, once the case or pallet is opened for use, the assigned barcode number must be logged out of HITS.

Tracking Log data shall be faxed, mailed, or e-mailed to the HAZMART at the end of the workweek or when the form is filled, whichever comes first. The HAZMART will enter the Hazardous Materials Tracking Log data into HITS for the activity/user. Data from the barcode reader shall be transferred, using a wedge and computer network capabilities. If inventories are maintained electronically, this information must be transferred to the HAZMART within one working day from the completion of data entry. This will ensure that the locations of materials are accurate in the inventory database.

(2) Container Transfers. Containers transferred from one location to another, either within or between activities, shall be logged out of the original location by using a barcode scanner or by completing a Hazardous Materials Tracking Log (encl. 3) and forwarding it to the HAZMART by the end of the workweek. To complete the transaction, the receiver must acknowledge receipt of the items by cosigning the Hazardous Materials Tracking Log. The material donor must send the form to the HAZMART during the same week.

(3) In-Container Tracking. In-container inventories can be maintained at the tracking system user's discretion. If an in-container inventory is desired, the user shall provide the following information by letter, fax or e-mail to the HAZMART.

- Container barcode number
- Product/chemical trade name
- Container size from the manufacturer's label
- Unit of measure desired

The unit of measure must be small enough to ensure that all issues are in whole numbers.

Note: Do not use fractions and decimals.

If the unit of measure is not from the same system (metric or English), provide the desired conversion (e.g., 1 pound received, plan to issue in grams; 1 pound = 454 grams). Examples:

1. 7A00000
2. acetone
3. 1 gallon
4. ounces

1. 7A00000
2. acetone
3. 1 gallon
4. pints

1. 7A00000
2. acetone
3. 1 gallon
4. milliliters (1 gallon = 3785 ml)

(4) Underground Storage Tank (UST)/Aboveground Storage Tank (AST). The HAZMART shall be notified of all USTs and ASTs and of their locations. The HAZMART shall be notified when USTs and ASTs are

refilled and when additional ones are added to or removed from the inventory.

(a) When storage tanks are refilled under an APG garrison contract, the HAZMART will obtain the necessary inventory data direct from DOL, regardless of the end user/activity.

(b) If storage tanks are refilled under a non-DOL contract, the user will provide the necessary inventory data, by sending the delivery form provided by the receiver to the HAZMART.

(5) Cylinders. All cylinders (refillable and nonrefillable), regardless of size, shall be tracked as hazardous materials in accordance with the Installation Hazardous Materials Management Policy. Each activity shall revise its Hazardous Materials Management Plan to reflect how its operations will comply with this general guidance. The recommended method is to track each cylinder individually according to established HITS and Hazardous Waste Tracking System (HWTS) procedures. However, due to the unique nature of the chemicals contained within cylinders and due to the varied supply systems for material delivery, storage, and use, the alternate methods described below may be used.

(a) Inert Chemical Tracking. For nonhazardous inert chemicals (e.g., oxygen), throughput data are not required. Each chemical in this category will be tracked according to the total amount of chemical on hand on the date having the highest total during the calendar year. A single barcode number will be issued for each location at which such items are stored or used. At building 100, for example, the highest total during the year is six 150-pound oxygen cylinders, of which four are issued to building 200, room 200, and two are issued to building 300. Each location will be provided a barcode that reflects its maximum inventory: six cylinders at building 100; four cylinders at building 200, room 200; and two cylinders at building 300. Annually the activity will verify the information, but not change the barcode.

(b) Non-TRI Hazardous Material Tracking. For any non-TRI hazardous material (e.g., acetylene), throughput data are not required at storage locations but are required at the locations where the chemical is used. Each chemical in this category will be tracked according to the total amount of chemical on hand on the date having the highest total during the calendar year at each storage and use location. Each activity shall report the throughput data for each location on a quarterly basis. Should the on-hand maximum change, the activity shall expeditiously notify the HAZMART, via the Hazardous Material Tracking Log or e-mail, so that inventories can be changed to reflect the new maximum. A single barcode number will be issued annually for each location at which such items are stored or used.

(c) TRI Chemical Tracking. Each cylinder containing a TRI chemical (e.g., chlorine) shall be tracked individually as outlined in section 2 of the APG Hazardous Materials Management Procedures Manual.

(6) Excess Hazardous Materials Reissue. Excess materials are those that are no longer needed by the original purchaser/user but that are still usable. When reissued, excess materials are free to the recipients. Two options are available to enable the reissue of excess hazardous materials on Aberdeen Proving Ground, the Defense Reutilization and Marketing Office (DRMO) and the "Freebies" database. Check with the DRMO first for possible sale of your unwanted materials to another government user. Only after that should you use the Freebies database.

(a) Freebies. The Freebies excess materials database is most easily accessed through the e-mail system at hazmart@dshe.apg.army.mil. Freebies data are also available through HITS. The most common procedures for sharing Freebies data are as follows. The HAZMART, after receiving a tracking log or electronic download from the user, enters the data into HITS and posts the excess hazardous materials information and the point of contact. Users without electronic communications can contact their activity environmental coordinator (AEC) and/or the HAZMART directly for current lists (410-436-7480). Each time the HAZMART receives a list of new items for Freebies, they will notify the DSHE Pollution Prevention Program manager, who will e-mail the AECs that additions have been made to Freebies.

(b) Ground Rules for All Transfers. Depending on the policies of each activity, a user may be required to obtain approval from the unit's AEC to accept items from Freebies.

Once items are transferred to another user, the donating and receiving activities must fill out and co-sign a Hazardous Materials Tracking Log to reflect the transfer. The log must be expeditiously faxed or e-mailed to the HAZMART by the donor.

In order to track progress (cost savings), the receiving activity should provide cost data (what each item would have cost had it been purchased) to the HAZMART on all items received. The cost data may be provided in the "Comments" section of the Hazardous Materials Tracking Log or by separate fax or e-mail to the HAZMART.

(c) Finding Excess Materials. Hazardous materials users in search of particular chemicals or products should contact the installation HAZMART or their AEC as appropriate. The HAZMART will put the user or the AEC in contact with other users who may have excess materials.

(d) Sharing Excess Materials. It is recommended that owners of excess hazardous materials list the items on Freebies before the products expire. To list items on Freebies, follow the guidelines in the "Freebies" section

above. Note that expired, useable items may also be transferred through Freebies at the discretion of the receiver.

(e) Getting Help. Hazardous materials users can contact their AEC, the Installation HAZMART, or the DSHE Pollution Prevention Program manager for assistance. DSHE pollution prevention specialists can visit your facility to help compile a list of your usable excess materials and can identify potential recipients. The specialists can also help you find desired materials that are excess items on the installation. Through e-mail, the AEC or DSHE pollution prevention specialists disseminate the list of excess materials to installation AECs. Anyone interested in receiving excess items can then contact the owners directly to inspect and arrange for the transfer of the materials.

(f) The Rules

- Use common sense.
- Use up existing stocks before switching to less toxic or nontoxic substitutes.
- Before purchasing any prohibited chemical or product, such as a Class I ozone-depleting chemical for which a purchase exemption has been granted because substitutes are not available, contact your AEC or the DSHE Pollution Prevention Program manager to determine if such materials are available as excess.
- Encourage participation in the Freebies program and/or ensure that viable substitutes are available to the user before suspending the purchase or use of prohibited items.
- List unused, unopened, usable materials in the Freebies database for at least 10 working days. Afterward, they can be withdrawn by the owner and turned in for disposition to DRMO or turned in for disposal through the Hazardous Waste Tracking System (HWTS). The user must prepare documentation for material turn-in through HWTS.
- If a Hazardous Materials Tracking Log is completed to turn in Freebies items, rather than entering the information directly into HITS, save or copy the tracking log to avoid having to fill out a second one to transfer the items to another user or to turn them in as waste if no other users express interest.
- After 10 working days, the user can choose to turn in the items as waste or to maintain the information in the Freebies database. If the user chooses to maintain the data in the Freebies database, this process will repeat every 10 days. If the user chooses to turn the items in as waste, he/she can change the status in HITS or cross out the “x” in the “Freebies List” column and mark the “turn in to HWTS” column on the original Hazardous Material Tracking Log, fax the form to the HAZMART, and proceed with normal HWTS turn-in procedures.

(g) Precautions. The receiving activity may, at its discretion, accept hazardous material in any condition it deems appropriate. However, before accepting excess hazardous materials, consider the following conditions.

- Is the material in useable condition?
- Are all container labels intact?
- Are Material Safety Data Sheets available, and do they match the container labels?
- Are any containers in a deteriorated condition (i.e., severely rusted, damaged, and/or leaking)?
- Is a HITS barcode affixed to each container?

Note: Contact the HAZMART when in doubt.

e. Contractor Requirements. All contractors who use hazardous materials in the performance of contracts on Aberdeen Proving Ground shall provide receipt, use, disposal, and MSDS information to the installation HAZMART weekly. This information will be provided to the APG Fire Department and Emergency Services, Harford County, the State of Maryland, and EPA as required. The HAZMART will assist each contractor in establishing procedures for initial and routine submissions of required information to the installation HAZMART. However, the contractor is solely responsible for providing the necessary information. The contractor may submit to the HAZMART written requests for inventory lists, MSDSs, and reference data.

All contractors are subject to audits or inspections by APG, state, local, and federal agencies. Failure to comply with EPCRA requirements will be referred to the appropriate regulatory agency for resolution. All contractors are responsible for the their subcontractors' meeting this requirement.

3. Activity Distribution Site (ADS)

An ADS is a location, within an activity, where hazardous materials are received and issued and where data regarding transfers, use, and disposal are maintained. An activity may elect to establish and operate its own ADS, provided it can ensure a 98-percent accurate chemical list and an 85-percent accurate container list, which is verified during annual inventory validations. If the lists do not meet the accuracy standards, the activity environmental coordinator will receive an Inventory Adjustment Report from DSHE. The Inventory Adjustment Report will include the location and condition of the material, the quantity of material on hand, stock records to show actual quantities, a cause of the discrepancies when they are found, and corrections of the discrepancies. All data collected by the ADS must be provided expeditiously to the installation

HAZMART. The standard operating procedures for each ADS must be approved by the HAZMART.

4. Ensuring Compliance

APG conducts annual hazardous materials inventory validations in cooperation with the APG Fire Department. APG reserves the right to inspect sites to ensure compliance with EPCRA, the APG Hazardous Materials Management Policy, and this procedures manual. It is solely the responsibility of each activity to provide required data to the installation HAZMART on a weekly basis via barcode reader or Hazardous Materials Tracking Log/Data Input Form.

To ensure compliance with all applicable laws and regulations regarding safety, health, and the environment, matrix inspections of facilities or work areas will be conducted as necessary. All hazardous material sites are subject to announced and unannounced inspections by APG, local, state, and federal inspectors.

5. Training

Training is an integral part of the APG Pollution Prevention Program. In addition to activity-specific pollution prevention training, DSHE offers training to the installation community. Contact the DSHE Pollution Prevention Program manager at 410-306-2275 to schedule the following classes for military, civilian, and contract employees.

a. P2 Awareness and Hazardous Materials Management. This fun and informative one-hour class highlights pollution prevention requirements and techniques for policy or procedural changes, equipment or process modifications, reuse of materials, material substitution, process efficiency improvements, improved housekeeping, and inventory control. This class provides instruction on using HITS and guidance on purchasing products that are environmentally preferable, energy efficient, or made with recycled content. The training can be condensed into less than one hour to accommodate time constraints.

b. Pollution Prevention - The Anthology. DSHE can tailor a training course to suit an activity's needs. The Pollution Prevention Handbook was developed as a practical resource for shop and office personnel. It consists of 12 independent modules that introduce several environmental programs and pollution prevention issues. Each module is designed to stand alone. The following training modules are available.

- Air Pollution
- Chesapeake Bay

- Storm Water Pollution
- Solid Waste Management and Recycling
- Hazardous Materials Management
- Pollution Prevention Requirements
- Material Safety Data Sheets
- Environmentally Preferable Products
- Life-Cycle Assessment
- Green Building
- Pollution Prevention Success Stories
- Pollution Prevention Information Sources

c. Pollution Prevention Refresher 1999–Green Painting. This 45-minute pollution prevention refresher training involves participants in a painting exercise designed to reinforce life-cycle costing, waste minimization, procedural modifications, cost savings associated with pollution prevention, environmentally preferable products, incorporation of proper planning into a process, and hazardous material tracking.

d. Pollution Prevention Refresher 2000–Case Study. This 45-minute pollution prevention refresher training focuses on the seven techniques of pollution prevention. It includes a discussion of a case study in small groups, which impresses the benefits of pollution prevention over pollution control.

e. Other Training. Classes may also be offered by tenant organizations. Contact the specific tenant AEC for more information.

6. Buying Green

APG employees are required to buy recycled and other environmentally preferable products in accordance with Executive Order (EO) 13101, *Greening the Government Through Waste Prevention, Recycling and Federal Acquisition,* and the Federal Acquisition Regulation, Part 23. For guidance on recycled content, consult the EPA Comprehensive Procurement Guideline and the Recovered Materials Advisory Notices (RMANs), companion documents that contain recommended minimum recovered material content standards for designated items as well as specifications and purchase mechanisms. RMANs are summarized in enclosure 4.

Once EPA designates a procurement item or product category, procuring agencies are required to comply within one year by purchasing the item with the highest practical level of recovered materials content. The Department of Defense policy on procurement of EPA-designated items is that 100 percent of such purchases will meet or exceed the guideline standards unless written justification, as part of the procurement file, cites at least one of the following conditions:

- The product is not available competitively within a reasonable time.
- The product does not meet appropriate performance standards.
- The product is available only at an unreasonable price.

Increasingly, environmentally preferable products cost about the same or significantly less than their counterparts. When comparing costs, consider the entire life of a product (i.e., waste disposal, personal protective equipment, air emissions, etc.). For example, a durable, high-quality product may be more expensive initially; but it will need replacing less often, resulting in cost savings.

Choose products made with the highest levels of postconsumer content. Postconsumer content results from discarded products that are reprocessed and used as raw material for another product (e.g., milk jugs that become raw material for plastic floor tiles).

Products that meet EPA guidelines are identified in the GSA catalog in green ink to assist the customer. Products in the APG Office Eagle store that meet the EPA guidelines, as well as other products deemed by the APG Pollution Prevention Program manager to be environmentally preferable when compared with other items in the store, are identified by the APG pollution prevention logo on the shelf below the products. Additionally, environmentally preferable product (EPP) and non-EPP symbols are indicated in each activity's inventory. The APG Pollution Prevention Program has also adopted standards for architectural paints to identify those that are environmentally preferable. For more information, contact the APG Pollution Prevention Program manager at 410-306-2275.

4 Encls